

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Martin D. Borst aka Martin Borst
Debtor

SN Servicing Corporation as Servicer
for U.S. Bank Trust National
Association, as Trustee of LB-Igloo
Series VI Trust
Movant
v.

Martin D. Borst aka Martin Borst
Jack N Zaharopoulos- Trustee
Respondents

Case No.: 5:25-bk-00376-MJC

Chapter: 13

Judge: Mark J. Conway

Hearing Date:
June 12, 2055 at 10:00 am

OBJECTION TO CONFIRMATION OF MODIFIED PLAN

PLEASE TAKE NOTICE SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of LB-Igloo Series VI Trust (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 52 ROBIN CIR, WYSOX, PA 18854, by and through its undersigned attorneys, hereby objects to the confirmation of the Modified Chapter 13 Plan on grounds including:

1. Secured Creditor objects to the Confirmation of any Plan which purports to impose a stay upon Secured Creditor. No stay attached upon the filing of the instant Bankruptcy pursuant to 11 U.S.C. §362(c)(4)(A)(i). Debtor’s attempt to impose the stay was denied pursuant to Order entered on April 2, 2025. ¹ See Doc. 31.

Dated: May 23, 2025

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Movant
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¹ Secured Creditor has not received formal service of any Motion to Impose Stay; Motion for Reconsideration; Chapter 13 Plan; or Amended Chapter 13 Plan.

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CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

The undersigned counsel for SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of LB-Igloo Series VI Trust, ("Secured Creditor") certify that, on the date stated hereon, I caused to be served a copy of the Objection to Plan filed on behalf of Secured Creditor on the parties in the manner specified on the attached service list.

The type(s) of service made on the parties was: electronic notification or first class mail, postage pre-paid. Where service is by electronic notification, the address of the party is listed for identification purposes only.

EXECUTED ON: May 23, 2025

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer

Lauren M. Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Movant

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Garden City, New York 11530

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Service by NEF

Trustee

Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Debtor's Counsel

Amy Lynn Bennecoff Ginsburg
Ginsburg Law Group, P.C.
653 W. Skippack Pike
Suite 300-71
Blue Bell, PA 19422

U.S. Trustee

Asst. U.S. Trustee
United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

Service by First-Class Mail

Debtor

Martin D. Borst
aka Martin Borst
52 Robin Circle
Wysox, PA 18854